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Snell & Wilmer

L.L.P.
LAW OFFICES

One Arizona Center
400 East Van Buren Street
Suite 1900
Phoenix, Arizona 85004-2202
602.382.6000
602.382.6070 (Fax)
www.swlaw.com

Michael W. Patten
(602) 382-6339
mpatten@swlaw.com

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Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: Notice of Filing - Joint Comments of TEP and UNS Electric
*In the Matter of the Notice of Proposed Rulemaking Regarding Interconnection
of Distributed Generation Facilities.*
Docket No. RE-00000A-07-0609

Pursuant to Steven M. Olea's June 26, 2015 request for informal comment on the draft proposed rules promulgated by Staff in the above-referenced docket, Tucson Electric Power Company and UNS Electric, Inc. hereby submit their Joint Comments on the draft rules.

Sincerely,

Michael W. Patten

MWP:jh

Attachment

Arizona Corporation Commission
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Tucson Electric Power Company and UNS Electric, Inc.

**Joint Response to Request for Informal Comment in the Matter of the Notice of Proposed
Rulemaking Regarding Interconnection of Distributed Generation Facilities
(Docket No. RE-00000A-07-0609)**

Tucson Electric Power Company ("TEP") and UNS Electric, Inc. ("UNS Electric") (collectively the "Companies"), hereby submit these joint comments in response to the Utilities Division's ("Staff") request for informal comment dated June 26, 2015 in the above-referenced docket.

The Companies appreciate the opportunity to provide informal comments on Staff's proposed rules for Interconnection of Distributed Generation Facilities ("Draft Rules"). The Companies suggest that following Staff's review of all of the comments submitted by stakeholders, that it issue a revised draft of the Draft Rules for comment prior to submittal to the Arizona Corporation Commission ("Commission") for formal rulemaking proceedings.

I. Overview.

The Companies' daily focus on operational excellence centers on our primary objective of delivering safe and reliable electricity to all of our customers. Our safety and reliability metrics over the years are a testament to the Companies' commitment to consistently meeting this objective. The foundation for this success begins with formulating policies and procedures that recognize the unique characteristics of the Companies' service territories and utility systems. In many cases, standard industry practices and procedures should be applied to all utilities. However, it is important to provide utilities with some flexibility under the rules that the Commission adopts for the utilities to have the ability to implement policies and procedures that allow for reasonable variations as each utility's system is different. This flexibility is especially important for the distributed generation interconnection rules.

Set forth below is the Companies' response to Staff's request for comment on specific questions, as well as the Companies' comments on the more substantive changes that are being suggested. The Companies reserve the right to provide additional comments once it has had an opportunity to review the next version of the Draft Rules. For purposes of these comments, capitalized terms not defined shall have the same meaning as set forth in the Draft Rules.

II. Responses to Staff's Specific Questions.

Staff's request for informal comment on the Draft Rules specifically asked the parties to comment on three specific areas. The Companies' comments on these areas are as follows:

1) Secondary Network Systems: R14-2-2616(D) and R14-2-2621.

The Companies do not have any secondary spot network systems but would appreciate the flexibility to study the impact of distributed generation on these networks if the Companies should install any Secondary Networks in the future.

2) Screens: R14-2-2617(A).

Staff has asked whether projects reaching the 50% aggregated generation threshold should be shifted to supplemental review, instead of full interconnection study. Relative to the aggregate generation screen threshold of 50%, the Companies suggest further review of the subject including consideration of raising the threshold. This screen is important in that it allows a utility to push Fast Track projects to the Study Track if the total generation on a distribution feeder or feeder segment poses safety or reliability concerns. In the Companies' experience, small residential photovoltaic systems qualified for Super Fast Track are not delayed by this screen. This is an area where more discussion could take place as it is critical that the Companies have sufficient time to be able to study impacts and power flow on system reliability.

3) Disconnect Switch: R14-2-2601(9), R14-2-2618(C)(5)(a)(v), R14-2-2618(C)(6)(b), R14-2-2619(C)(6)(a)(v), R14-2-2619(C)(7)(b), and R14-2-2620(C)(11)(a)(v).

The Companies strongly believe that failure to require a disconnect switch on all distributed generation ("DG") facilities, regardless of size, *compromises customer and employee safety*, as well as service reliability. The disconnect switch must have a visible air gap in the open position and be capable of being locked in the open position. When working on a system assumed to be de-energized, the worker must verify that all sources of energy have been disconnected. For electrical systems, the only foolproof method of verifying that a system is de-energized is to have a visual air gap on the disconnect switch. In addition, because the worker may not always be in proximity to all switching points, it is important that he or she have the capability of locking the switch in the open position.¹

III. Proposed Substantive Revisions to the Draft Rules.

The Companies' current distributed generation interconnection rules are consistent in large part with the Draft Rules. The Companies have been implementing interconnection standards consistent with Decision No. 69674 (June 28, 2007), and have posted those interconnection rules, application forms and process information on their respective websites. However, there are certain substantive elements of the Draft Rules which the Companies would suggest Staff modify because they are critical to safety and reliability. The following paragraphs will generally describe the Companies' reasoning for proposing needed changes to the Draft Rules as reflected in the redline of the Draft Rule section below each comment. Representatives of the Companies would be happy to discuss and provide further detail to Staff on these proposed revisions upon request.

A. Definitions: R14-2-2601.

1. Definition of "Interconnection", "Interconnection Facilities" and new definition for "Utility Owned Interconnection Facilities"

¹ Some customers and installers of inverter-based generation (which includes solar DG) argue against utilities requiring a disconnect switch. For example, they contend that (i) a UL 1741 inverter will automatically shut down in the event of a loss of utility voltage and (ii) for a load side interconnection, the utility can disconnect the generation by opening the customer's breaker. The Companies strongly disagree with both of these positions. First, a UL 1741 listing does not guarantee the device will not malfunction and ultimately back-feed an otherwise de-energized service. Second, the customer's breaker (i) could be locked by the customer and inaccessible to the utility, (ii) does not feature a visible air-gap for isolation verification, or (iii) cannot be locked in the open position.

The Utility may own certain equipment on the Customer's premises for protection and communication purposes. The Draft Rules do not include the concept of Utility-Owned Interconnection Facilities. These definitions could be clarified and refined as follows:

"Interconnection" means the physical connection of a Generating Facility to the Distribution System.

Interconnection Facilities" means facilities and equipment owned by the Customer to connect the Generating Facility to the Distribution System.

"Utility Owned Interconnection Facilities" means facilities and equipment installed by the Utility needed to connect the Generating Facility to the Distribution System, including any modifications, additions, protective devices, or system upgrades. Such protective devices promptly disconnect the Generating Facility from the Distribution System in the event of a power outage on the Distribution System.

2. Definition of "Customer"

The Companies recommend that the definition of "Customer" be revised to reflect the appropriate entity to execute the Interconnection Agreement. The definition should state:

"Customer" means a customer of the Utility that is the legal owner of the premises on which a Generating Facility is or will be located."

3. Definition of "Good Utility Practice"

The Companies are recommending a definition which aligns with other key generation ownership and participation agreements with other utilities. The Companies suggest deleting the last sentence of the definition because it contradicts and generalizes the standard set forth in the preceding sentence.

"18. "Good Utility Practice" means any of the practices, methods, and acts engaged in or approved by a significant portion of Utilities in the electric industry in the United States during the relevant time period, or any of the practices, methods, and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety, and expedition. ~~Good Utility Practice is not intended to be limited to the optimum practice, method, or act to the exclusion of all others, but rather to be acceptable practices, methods, or acts generally accepted in the region.~~"

4. New definition for "Clearance"

The word "clearance" is not defined and is used in multiple places that have a different meaning. The Companies' suggested definition makes it clear that the word refers to the utility clearance and not the clearance from the authority having jurisdiction. Where the Draft Rules refer to the authority having jurisdiction, the Companies suggest using the phrase "approval of the authority having jurisdiction" rather than "clearance from the authority having jurisdiction" so as to not confuse the meaning of the word.

" "Clearance" means a statement, with documentation, from the Utility that said line or equipment is disconnected from all known sources of power and tagged, and that for safety purposes all proper precautionary measures have been taken and those workmen may proceed to inspect, test, and install grounds on the circuit. "

5. Definition of "Smart Inverter"

The Companies recommend addition of this definition to support customer rights and responsibilities changes.

"Smart Inverter" means a system with capability of converting DC energy to AC energy and provides a TCP/IP Ethernet interface for communications and control of system parameters via industry accepted protocols and standards."

B. Applicability: R14-2-2602(B) and new R14-2-2602(E).

The Companies recommend clarification to the measurement of "AC" in all places where capacity is indicated in the Draft Rules. The Companies also recommend adding a provision that provides flexibility in the Utility's Interconnection Manual to the Utility to address deviations required for Generating Facilities over 10 MW at a single Point of Interconnection.

"E. The Utility has the discretion to interconnect Generating Facilities over 10 MW AC at a single Point of Interconnection, and/or to address interconnections over 10 MW in its Interconnection Manual."

C. Types of Generation Facilities: R14-2-2603.

1. Momentary Parallel System: R14-2-2603(A)3(a).

We suggest revising "10 seconds" to "150 milliseconds (9 cycles)." The closed transition parallel time of 10 seconds for a momentary system is far too long. This opens the utility and customers to considerable risk of damage and/or outages if something goes wrong. The transition time should be shortened to a maximum of 0.15 seconds (aka 150 milliseconds or 9 cycles). Existing transfer switch technology can easily accommodate this shorter switching time at a reasonable cost.

D. Customer Rights and Responsibilities: R14-2-2604.

1. R14-2-2604(A).

The Companies recommend that Draft Rules make clear that any right of the Customer to interconnect is dependent on the interconnection being in full compliance with the Draft Rules. The first sentence of this subsection should read:

"A. A Customer has the right to interconnect a Generating Facility with the Distribution System provided the Interconnection and Generating Facility comply with the requirements set forth in this Article and each Utility's Interconnection Manual."

2. R14-2-2604(B)(5).

The Companies recommend that the Draft Rules delete "but no more or less than the present standard of care observed by regular Utility/consumer connections." This change is important because the utility is in the best position to gauge power quality.

"5. The Generating Facility does not adversely affect the quality of service to other Customers, consumers (but no more or less than the present standard of care observed by regular Utility/consumer connections); The Generation Facility meets specific operating criteria as outlined in each Utility's Interconnection Manual, and the Utility should approve the Interconnection. For inverter-based Generating Facilities, Smart Inverters are required. For more information regarding the requirements for Smart Inverters refer to the Utility's Interconnection Manual."

3. R14-2-2604(B)(6) and R14-2-2604(F).

The Companies strongly believe that the following provisions should be revised as follows to facilitate safe operations. The Companies also recommend consolidating the provisions of **R14-2-2604(F)** into new provisions under **R14-2-2604(B)**, and by adding an additional provision.

"B. The Customer has the responsibility of disclosing to the Utility items specified herein on the Generating Facility and its operation. The Customer also has the responsibility of ensuring that:

"6. The Generating Facility ~~minimally hampers~~ does not hamper efforts to restore a feeder to service (specifically when a Clearance is required);"

"9. Customer has executed an Interconnection Agreement, and all other applicable purchase, supply, and standby agreements;

10. The Interconnection complies with these rules, the Utility's Interconnection Manual, all applicable tariffs, rate schedules and Utility service requirements; and

11. If the Customer does not own, operate or maintain the Generating Facility, then the entity that owns, operates or maintains the Generating Facility is in compliance with the requirements set forth in this Article and each Utility's Interconnection Manual."

4. R14-2-2604(C) and R14-2-2604(D).

We suggest reorganizing Parts C and D to help provide a better understanding of these specific customer rights and responsibilities. The Companies also recommend that in all places “reasonable cost estimates” be changed to “non-binding good faith cost estimates.” This change holds each utility to their respective standards.

“C. The Customer is responsible for designing, installing, operating, and maintaining all Interconnection Facilities required by the Utility's ~~Interconnection Manual~~ to interconnect the Generating Facility to the Distribution system. Such facilities shall be located on the Customer's premises and shall include all equipment as may be required to deliver power from the Generating Facility to the Distribution System at the Point of Interconnection. These may include connection, transformation, switching, protective relaying, metering, Disconnect Switch, communication, and safety equipment, and any other requirements as outlined in this Article or other special items specified by the Utility. All such Interconnection facilities are to be installed ~~by the Customer at its sole expense in accordance with the Utility's Interconnection Manual at the sole expense of the Customer.~~ The devices furnished by the Customer for Distribution System shall be owned and operated by the Utility.”

D. The Customer, or Customer's agent, shall own and be responsible for designing, installing, operating and maintaining control and protective devices, in addition to minimum protective devices and relays specified in the Utility's Interconnection Manual, to protect its facilities from abnormal operating conditions such as, but not limited to, electric overloading, abnormal voltages, and Fault Currents. Such protective devices must promptly disconnect the Generating Facility from the Distribution System in the event of a power outage on the Distribution System. ~~The Customer shall also own and be responsible for designing, installing, operating and maintaining Interconnection facilities on the Customer's premises as may be required to deliver power from the Generating Facility to the Distribution System at the Point of Interconnection.~~”

5. R14-2-2604(E).

The Companies recommend the following revisions to better align with standard business practices during the interconnection process. If not for the Customers' generation, such facilities would not be installed on the Utility's Distribution System and would not require any replacement or maintenance expenditure by the Utility. Some of this equipment is very expensive and future costs should not be the responsibility of the Utility or other ratepayers when it is for the direct benefit of the one customer who caused it to be installed.

“E. In the event that additional facilities are required to be installed on the Distribution System to accommodate the Customer's generation, the Utility will install, replace, and maintain such facilities at the Customer's expense. The Utility shall provide notice to the Customer of intent to install such facilities early in the process. A Facility Study may be required to further identify the costs and scope

associated with any proposed work and required Utility Owned Interconnection Facilities. The Customer is not responsible for Utility upgrades for other consumers for the public unrelated to the Generating Facility installation

E. Utility Rights and Responsibilities: R14-2-2605.

1. R14-2-2605(A).

The Companies suggest the following revisions as more accurately aligning with the interconnection process. The baseline assumption is that unless the Generating Facility complies with the requirements, the Utility will not move forward with the Interconnection.

"A. The Utility is obligated to interconnect Generating Facilities, ~~subject to which~~ comply with the requirements set forth in this Article and in each Utility's Interconnection Manual."

2. R14-2-2605(C).

The Companies recommend the following revisions to remove any ambiguity or subjective interpretation relative to safety.

"C. Because the Utility is required to safeguard its system, other Utility consumers customers, and the general public, the Utility has the right and responsibility to ensure that an interconnected Generating Facility:

- 1. Will not present any ~~unreasonable~~ hazards to Utility personnel, other Utility customers, or the public;*
- 2. ~~Minimizes the possibility~~ Will not cause damage to the Utility and other Utility customers' equipment; and*
- 3. ~~Minimally hampers~~ Does not hamper efforts to restore a feeder to service (specifically when a Clearance is required)"*
- 4. Will not interfere with the safe, reliable operation of or service provided by the Distribution System.*

3. R14-2-2605(xx).

The Companies suggest the addition of provisions which distinguish that there may be Utility Owned Interconnection Facilities. Further, it is important to clarify that the Utility has no obligation to maintain lines or equipment on the Customer's side of the Point of Interconnection, and, consistent with good resource planning, the Utility has the right to deploy interconnection resources to maintain grid reliability and affordability.

"The Utility may require certain Utility Owned Interconnection Facilities including but not limited to, protection, metering, communications, and safety equipment. All such Utility Owned Interconnection Facilities are to be installed in accordance with the Utility's Interconnection Manual."

4. R14-2-2605(xx).

The Companies recommend the addition of the following provisions which are already part of the Companies' interconnection processes.

"I. The Utility has no obligation to install or maintain any lines or equipment on a Customer's side of the Point of Interconnection, except that the Utility may install Utility Owned Interconnection Facilities. Only Utility authorized employees may make and energize the service connection between the Distribution System and the Customer's service entrance conductors.

J. The Utility has the right to deploy interconnection resources and Utility Interconnection Facilities to maintain grid affordability, reliability, safety and stability, and to require additional certification, training or experience in developing its Interconnection Manual requirements."

F. Application Submission Requirements: R14-2-2611(A)-(D).

The Companies propose revising the Draft Rules to combine the application provisions into one general section about the interconnection process. The combined section could read as follows:

"R14-2-2611. Application Submission Requirements

A. Application. The Customer shall complete the Application and submit it to the Utility along with all required supplemental information which shall be noted on the Application form.

1. The Utility shall notify the Customer within twelve (12) calendar days of receipt of the Application.

2. If the Application is incomplete, or if the Utility must transfer the Generating Facility from Level 1 Super Fast Track or Level 2 Fast Track, the Utility shall specify what information or material is necessary to complete the Application.

3. The Customer has thirty (30) calendar days after receipt of such notification to submit the missing information or materials (or request an extension), or the Application may be considered withdrawn.

4. After the Customer submits any missing information, the Utility has twelve (12) calendar days to determine if the Application is complete or incomplete and notify the Customer.

B. Additional Documentation. The Utility may require additional documentation be submitted with the Application. Each Utility's Application form shall specify what additional documentation is required. Additional documentation may include, but is not limited to, an electrical one-line diagram, an electrical three-line diagram, AC and DC control schematics, plant location diagram, and site plan. Upon request, the Utility shall provide the Customer with sample diagrams that indicate the preferred level of detail and type of information required for a typical inverter-based system.

C. Time-frames. If the Customer does not submit requested materials necessary to process the Application, or submit applicable executable agreements within thirty (30) calendar days, or request an extension, the Application may be considered withdrawn.

D. Design. Prior to Submitting Application, the Customer may contact the Utility at the conceptual stages of the design to discuss the proposed design, installation, and operation. Upon the Customer's request, the Utility shall meet with the Customer prior to submission of an Application."

G. Fees and Costs: R14-2-261XX.

The Companies recommend the addition of the following Draft Rule which makes the fees and costs clearly understood. This language is a combination of all the provisions throughout the Draft Rules which reference fees and costs, combined into one concise rule.

"A Utility may charge reasonable fees for the application, studies, study costs and any additional reviews, including applicable tax gross ups. The Utility shall provide a non-binding good faith estimate of all fees and costs, where applicable. If required by the Utility, the Customer shall submit a deposit for the estimated fees and/or costs before a study or any additional review will be initiated, or before the Interconnection can proceed. The Utility may charge the Customer for any re-inspections and reconnections as set forth in these rules. In addition, the Customer shall have the responsibility for any costs of Utility Owned Interconnection Facilities including replacement, maintenance, and equipment modifications necessary to accommodate the Customer's Interconnection."

H. Minor Modification: R14-2-2612.

The Companies recommend the following revision:

"It is recognized that certain Applications may require minor modifications to the Generating Facility or the Application while they are being reviewed by the Utility which do not have an impact on Customer's compliance with the Utility's Interconnection Manual."

I. Certification: R14-2-2614.

These certifications changed from time to time and this information may be more appropriate in the Interconnection Manual. At a minimum the Companies recommend the following updates below:

IEEE Std 929-2000 IEEE Recommended Practice for Utility Interface of Photovoltaic (PV) Systems;

NFPA 70 (2002/2014), National Electrical Code;

IEEE Std C37.90.1-1989 (R1994)-2002, IEEE Standard Surge Withstand Capability (SWC) Tests for Protective Relays and Relay Systems Associated with Electric Power Apparatus;

14. NEMA MG 1-1998, Motors and Small Resources, Revision 3;

J. Disconnection from or Reconnection with the Distribution System: R14-2-2615.

1. Non-compliance with Technical Interconnection Requirements: R14-2-2615(A)(2).

It is important to distinguish that the Utility, not the Customer, is completing the reconnection.

"2. Non-compliance with technical Interconnection requirements. A Utility may disconnect a Generating Facility if the facility is not in compliance with the technical requirements and the Utility's Interconnection Manual. Within two (2) Business Days days from the time the Customer notifies the Utility that the Generating Facility has been restored to compliance with the technical requirements, the Utility shall have an inspector verify such compliance, at the Customer's expense. Upon such verification, the ~~Customer-Utility~~, in coordination with the ~~Utility may Customer~~, will reconnect the Generating Facility."

2. Disconnect Switch: R14-2-2615(D)(xx).

The Companies believe that the following is necessary and important to add for safety purposes.

"Utility has the right to require the installation of a Disconnect Switch. The Customer shall not remove or tamper with any locks or other components on the Disconnect Switch."

3. R14-2-2615(F).

It is important for safety reasons to clarify the Customer's obligations with respect to the Disconnect Switch.

"Upon termination of the Interconnection Agreement, the Customer shall be responsible for ensuring that the Disconnect Switch is immediately opened, and the electrical conductors connecting the Generating Facility to the Distribution System are immediately lifted and permanently removed, so as to preclude any possibility of an inadvertent interconnected operation in the future. The Utility may inspect the Generating Facility to verify that it is permanently disconnected."

K. Summary of Interconnection Levels and Tracks: R14-2-2616 - R14-2-2620.

1. General Comments

Similar to our recommendation to combine sections for the Application, the Draft Rules could be streamlined through the combination of existing language within each Interconnection track.² Overall the Companies suggest a closer examination of the interconnection track processes and discussion over timeframes for review and processing interconnection applications, given the significant volume of interconnection applications currently being processed. A workshop between the utilities could be beneficial.

² New combined sections are recommended for Interconnection Agreement, Utility Review of Application, Inspection and Testing, Notification and Corrections since these provisions apply across all Interconnection tracks and since the timeframes and processes could be more synchronized.

2. Summary of Interconnection Tracks: R14-2-2616(A).

Super Fast Track review should be limited to single-phase systems. Three-phase systems often involve evaluation of system grounding methods and although the smaller the system, the less the risk, this is still something that needs to be reviewed by the Technical Services group.

"A. Level 1 Super Fast Track. Certified inverter-based facilities that have a power rating of 10 kW AC or less, are single-phase, are interconnected on a Radial Line, and meet screens."

L. Level 1 Super Fast Track: R14-2-2618.

1. R14-2-2618(A)

There is no "screen (F) in IEEE 929. Also, IEEE 929 is no longer an active standard. The shutdown protective functions defined and quantified in IEEE 1547 Section 4.2 should be an adequate substitute.

"The inverters must be UL 1741 listed, and certified to meet the shutdown protective functions (under/over voltage, under/over frequency and anti-islanding) specified in IEEE 1547, section 4.2 ~~IEEE 929, screen (F).~~"

2. R14-2-2618(C)5(a)vii and R14-2-2619(C)6(a)vi and R14-2-2620(C)11(a)vi

In all cases, the language "as best as can be determined" as it relates to utility inspection of generation facility wiring should be removed. If the utility has made the effort to review and approve customer electrical diagrams, the Customer, in turn, should be expected to install the system, including all wiring, as shown on the approval drawings.

3. R14-2-2618(C)5(c)

The Companies would suggest a revision to this provision for safety purposes. Improper labeling can also lead to safety violations and the importance of labeling needs to be highlighted in the Draft Rules.

"c. The Utility ~~may does not have the right to fail a site inspection in the event that any of the above three requirements (metering, Utility equipment labeling, and the identification of the Generating Facility on the operating maps) are not in place at the time of the site inspection. The Utility does have the right to fail any Generating Facility that does not meet the applicable Interconnection requirements, is not installed in accordance with the documentation submitted to the Utility, lacks proper labeling required by the Utility Interconnection Manual, or as a result of any safety or protection violation.~~"

M. Level 3 Fast Track: R14-2-2620(C)(7) and R14-2-2620(C)(9)(a).

Thirty (30) days for a System Impact Study and Facility Study is inconsistent with FERC guidelines and the Companies suggest a revision to this provision to extend the timeframe to ninety (90) days.

"a. The System Impact Study will be completed within ~~thirty (30)~~ ninety (90) calendar days, unless other mutually agreeable terms are made.

a. The Facilities Study shall be completed within ~~thirty (30)~~ ninety (90) calendar days, unless other mutually agreeable terms are made."

N. Utility Reporting Requirements: R14-2-2622.

The Companies suggest that the rule not require pre-approval of the Interconnection Manual nor should updates be subject to sixty (60) day waiting period as this could be a barrier to safe and reliable operation of the Distribution System.

The Companies suggest a further review of existing filings to determine if these Utility Reporting Requirements are duplicative, or if they could be streamlined with other existing reports.

IV. Conclusion.

The Companies appreciate the opportunity to participate in Staff's request for informal comment on the Draft Rules. The Companies believe that the recommended changes explained above are necessary to preserve our commitment to providing safe and reliable services to our customers. If Staff provides stakeholders with the opportunity to provide comments on a revised draft of the Draft Rules, the Companies would recommend various formatting and organizational changes to the document with the goal of streamlining the rules and enhancing the implementation and administration of the Draft Rules, particularly as they relate to the various interconnection tracks. An examination of timeframes and processes would be beneficial to preserve the stakeholders' varying reliability requirements, and the Companies would support a workshop to gather the stakeholders to review any revised drafts of the Draft Rules.